

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS**

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FAN ZHANG, Individually and On Behalf of  
All Others Similarly Situated,

Plaintiff,

v.

GROUPON, INC., ANDREW D. MASON,  
JASON E. CHILD, JOSEPH M. DEL PRETO,  
ERIC P. LEFKOFSKY, THEODORE J.  
LEONSIS, PETER J. BARRIS, KEVIN J.  
EFRUSY, MELLODY HOBSON, BRADLEY A.  
KEYWELL, HOWARD SCHULTZ, MORGAN  
STANLEY & CO. LLC, GOLDMAN, SACHS &  
CO., CREDIT SUISSE SECURITIES (USA)  
LLC, ALLEN & COMPANY LLC, MERRILL  
LYNCH, PIERCE, FENNER & SMITH  
INCORPORATED, BARCLAYS CAPITAL  
INC., CITIGROUP GLOBAL MARKETS INC.,  
DEUTSCHE BANK SECURITIES INC., J.P.  
MORGAN SECURITIES LLC, WELLS FARGO  
SECURITIES, LLC, WILLIAM BLAIR &  
COMPANY L.L.C., LOOP CAPITAL  
MARKETS, INC., RBC CAPITAL MARKETS  
LLC and THE WILLIAMS CAPITAL GROUP,  
L.P.,

Defendants.

**No. 1:12 CV 2450**

**CLASS ACTION**

Judge Charles R. Norgle, Sr.

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KATHLEEN ROSELLI, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

GROUPON, INC., ERIC P. LEFKOFSKY,  
ANDREW D. MASON, JASON E. CHILD,  
KEVIN EFRUSY, THEODORE J. LEONSIS,  
HOWARD SCHULTZ, JOSEPH M. DEL  
PRETO, MORGAN STANLEY & CO. LLC,  
GOLDMAN, SACHS & CO., and CREDIT  
SUISSE SECURITIES (USA) LLC,

Defendants.

**No. 1:12 CV 2460**

**CLASS ACTION**

Judge Charles R. Norgle, Sr.

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DENNIS EINSPAHR, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

GROUPON, INC., JASON E. CHILD, JOSEPH  
M. DEL PRETO, ANDREW D. MASON, ERIC  
P. LEFKOFSKY, PETER J. BARRIS, KEVIN J.  
EFRUSY, MELLODY HOBSON, BRADLEY A.  
KEYWELL, THEODORE J. LEONSIS,  
HOWARD SCHULTZ, MORGAN STANLEY &  
CO. LLC, GOLDMAN, SACHS & CO.,  
CREDIT SUISSE SECURITIES (USA) LLC,  
ALLEN & COMPANY LLC, MERRILL  
LYNCH, PIERCE, FENNER & SMITH  
INCORPORATED, BARCLAYS CAPITAL  
INC., CITIGROUP GLOBAL MARKETS INC.,  
DEUTSCHE BANK SECURITIES INC., J.P.  
MORGAN SECURITIES LLC, WELLS FARGO  
SECURITIES, LLC, WILLIAM BLAIR &  
COMPANY L.L.C., LOOP CAPITAL  
MARKETS, INC., RBC CAPITAL MARKETS  
LLC and THE WILLIAMS CAPITAL GROUP,  
L.P.,

Defendants.

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) **No. 1:12 CV 2547**

) **CLASS ACTION**

) Judge Charles R. Norgle, Sr.

JOHN PEDROW, Individually and On Behalf of  
All Others Similarly Situated,

Plaintiff,

v.

GROUPON, INC., ANDREW D. MASON,  
JASON E. CHILD, JOSEPH M. DEL PRETO,  
ERIC P. LEFKOFSKY, THEODORE J.  
LEONSIS, PETER J. BARRIS, KEVIN J.  
EFRUSY, MELLODY HOBSON, BRADLEY A.  
KEYWELL, HOWARD SCHULTZ, MORGAN  
STANLEY & CO. LLC, GOLDMAN, SACHS &  
CO., CREDIT SUISSE SECURITIES (USA)  
LLC, ALLEN & COMPANY LLC, MERRILL  
LYNCH, PIERCE, FENNER & SMITH  
INCORPORATED, BARCLAYS CAPITAL

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) **No. 1:12 CV 2791**

) **CLASS ACTION**

) Judge Charles R. Norgle, Sr.

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INC., CITIGROUP GLOBAL MARKETS INC., )  
 DEUTSCHE BANK SECURITIES INC., J.P. )  
 MORGAN SECURITIES LLC, WELLS FARGO )  
 SECURITIES, LLC, WILLIAM BLAIR & )  
 COMPANY L.L.C., LOOP CAPITAL )  
 MARKETS, INC., RBC CAPITAL MARKETS )  
 LLC and THE WILLIAMS CAPITAL GROUP, )  
 L.P., )  
 )  
 Defendants. )

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JOHN H. COTTRELL, Individually and On )  
 Behalf of All Others Similarly Situated, )  
 )  
 Plaintiff, )

v. )

GROUPON, INC., ANDREW D. MASON, )  
 JASON E. CHILD, JOSEPH M. DEL PRETO, )  
 ERIC P. LEFKOFSKY, THEODORE J. )  
 LEONSIS, PETER J. BARRIS, KEVIN J. )  
 EFRUSY, MELLODY HOBSON, BRADLEY A. )  
 KEYWELL, HOWARD SCHULTZ, MORGAN )  
 STANLEY & CO. LLC, GOLDMAN, SACHS & )  
 CO., CREDIT SUISSE SECURITIES (USA) )  
 LLC, ALLEN & COMPANY LLC, MERRILL )  
 LYNCH, PIERCE, FENNER & SMITH )  
 INCORPORATED, BARCLAYS CAPITAL )  
 INC., CITIGROUP GLOBAL MARKETS INC., )  
 DEUTSCHE BANK SECURITIES INC., J.P. )  
 MORGAN SECURITIES LLC, WELLS FARGO )  
 SECURITIES, LLC, WILLIAM BLAIR & )  
 COMPANY L.L.C., LOOP CAPITAL )  
 MARKETS, INC., RBC CAPITAL MARKETS )  
 LLC and THE WILLIAMS CAPITAL GROUP, )  
 L.P., )  
 )  
 Defendants. )

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**No. 1:12 CV 3129**

**CLASS ACTION**

**Judge Charles R. Norgle, Sr.**

**NOTICE OF PRESENTMENT OF THE MOTION BY  
MICHAEL CARTER COHN FOR CONSOLIDATION, APPOINTMENT  
AS LEAD PLAINTIFF AND APPROVAL OF LEAD COUNSEL**

PLEASE TAKE NOTICE THAT on Friday, June 15, 2012 at 10:30 a.m., or as soon thereafter as counsel may be heard, counsel for Michael Carter Cohn (“Cohn”), shall appear before the Honorable Charles R. Norgle, Sr. or any judge sitting in his stead, in Courtroom 2341 of the Dirksen Federal Building, 219 South Dearborn Street, Chicago, IL 60604, and there and then present Cohn’s Motion for Consolidation, Appointment as Lead Plaintiff and Approval of Lead Counsel, a copy of which is served upon you.

Dated: June 4, 2012  
Chicago, Illinois

Respectfully submitted,

**POMERANTZ HAUDEK  
GROSSMAN & GROSS LLP**

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**Counsel for Movant and Proposed  
Lead Counsel for the Class**